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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

AHMED HIGAZI, on behalf of himself and a

class of those similarly situated,

Plaintiff,

vs.

CADENCE DESIGN SYSTEMS, INC.,

Defendant

No.: C-07-2813-JW

SUPPLEMENTAL DECLARATION OF
TRAE SMITH DESCRIBING
SETTLEMENT ADMINISTRATION

1 I, TRAE SMITH, declare:

2 1. I am Project Manager for Settlement Services, Inc. (the "Settlement
3 Administrator"). The Settlement Administrator was appointed by the Court in the above-
4 captioned lawsuit; among other things, to (1) track and timely report to Class Counsel and
5 Counsel for Cadence returned Claim Forms; and (2) resolve disputes by Class Members
6 regarding the number of Compensable Work Weeks or other matters, and notify Class Counsel
7 and Counsel for Cadence of such dispute and their resolution.

8 2. The deadline for postmarking completed Claim Forms was June 4, 2008. As of
9 the date of this declaration, the Settlement Administrator received two (2) untimely Claim
10 Forms, which the parties have agreed to treat as timely. Previously, the Settlement Administrator
11 had received 182 Claim Forms, all of which had been deemed valid. Therefore, the Settlement
12 Administrator has received 184 valid Claim Forms (this constitutes an 89% participation rate). A
13 true and correct copy of the most recent weekly report, which updates Class Counsel and
14 Cadence's Counsel with information regarding Class Member response to the Notice, is attached
15 hereto as Exhibit A.

16 3. As of the date of this declaration, the Settlement Administrator received thirteen
17 (13) timely challenges in regards to work location or number of weeks worked. Eight (8)
18 challenges were denied because the Class Members sought to extend their dates of employment
19 beyond the Class Period. *See Declaration of Trae Smith Describing Settlement Administration*
20 *(Docket No. 68-7)*. Two (2) challenges were deficient due to failure to include documentary
21 evidence. On June 12, 2008, challenge deficiency letters were mailed to those two (2) Class
22 Members via Federal Express Overnight Delivery. The challenge deficiency letters informed
23 the Class Members that they must submit documentary evidence by June 16, 2008, in order for
24 their challenge to be considered. Of these two deficient challenges, one class member
25

1 subsequently submitted documentary evidence, and one did not. Thus, one of these challenges
2 was denied for failure to include documentary evidence as required under the Settlement.

3
4 4. The Settlement Administrator reviewed the four (4) remaining valid challenges
5 and requested that Cadence Design Systems, Inc. ("Cadence"), provide additional information
6 related to the challenged information. On July 1, 2008, the Settlement Administrator received
7 the requested information related to the valid challenges. Per the Settlement Administrator's
8 review of the requested information, these four (4) valid challenges were denied because the
9 Class Members sought to include time outside of the covered period or for positions/grades
10 outside the class. On July 2, 2008, challenge denial letters were mailed to those four (4) Class
11 Members via First Class U.S. Mail.

12
13 I declare under penalty of perjury under the laws of the State of Florida and of the United
14 States that the foregoing is true and correct, and that this Declaration was executed this 2nd
15 day of July 2008, in Tallahassee, Florida.

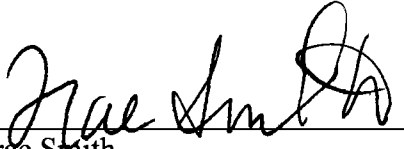
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17 
18 Trae Smith
19 Settlement Services, Inc
20 2032-D Thomasville Road
21 Tallahassee, Florida 32308
22 Telephone: (850) 385-6216
23 Facsimile: (850) 385-6008
24
25

EXHIBIT A**Higazi v. Cadence Design Systems, Inc.****As of: 07/02/08**

Notices Mailed: 04/04/08
 Claim Form Deadline: 06/04/08
 Challenge Deadline: 06/04/08
 Opt-Out Deadline: 05/20/08
 Objection Deadline: 05/20/08
 Final Approval Hearing: 07/07/08

Class Periods:
 California: 05/30/03 until 03/12/08
 Other States: 05/30/04 until 03/12/08
 Class Size: 207
 Current Filing Percentage: 89%

	Description	Count
Mail	Notices Mailed	207
	Undeliverable Notices	2
	Forwarded Notices	0
	Notices Traced	2
	Re-mailed Notices	Mailed Reminder Cards
	Notices Returned 2 nd Time	0
Claims	Claim Forms (Timely)	184
	Claim Forms (Untimely)	0
	Challenges	13
	Opt-Outs	0
	Objections	0
	Rescissions	4
	Withdrawals	0
Class	Class Size	207
	% Filing Claims	89%
	% of Total Funds Claimed	92%
	% of Opt-Outs	0%
	% of Total Funds of those who Opted Out	0%